CALL FOR INPUT

Name of submitter	Federica Dossi
Affiliated organization of submitter	Carbon Market Watch
Email of submitter	federica.dossi@carbonmarketwatch.org
Date of submission	13/07/2026

Document reference number and title: (Recommendation from the MEP to SBM020)
Draft mechanism methodology: Electricity generation from renewable sources connected to an electricity system (version 02.0)

Item	**Section no.** (as indicated in the document)	**Paragraph/Table/Figure no.** (as indicated in the document)	**Comment** (including justification for change)	**Proposed change** (including proposed text)
1	COVER NOTE	General comment	The call for input on the 2 methodologies recommended for adoption at SBM 022 is only open from 6 to 13 July. This window is far too short for stakeholders to be able to give proper responses and risks penalising stakeholders with fewer resources and capacity to respond. It falls well short of the 21-day period required under paragraph 91 of the "Procedure: Development, revision and clarification of methodologies and methodological tools". It also runs counter to paragraph 21 of decision 20/CMA.7, in which the CMA mandates the Supervisory Body to facilitate broad stakeholder engagement, in particular for the groups that face barriers to participation. We request that the window be extended until at least the 27th of July 2026.	-

Document reference number and title: (Recommendation from the MEP to SBM020) Draft mechanism methodology: Electricity generation from renewable sources connected to an electricity system (version 02.0)				
Item	**Section no.** (as indicated in the document)	**Paragraph/Table/Figure no.** (as indicated in the document)	**Comment** (including justification for change)	**Proposed change** (including proposed text)
2	4. APPLICABILITY	Paragraph 14	Carbon Market Watch strongly prefers option A1, where only activities implemented in a least developed country (LDC) or small island developing state (SIDS) are eligible for this methodology. We explained our reasons in our last submission (Item 3). See: https://unfcccstawebprd01.blob.core.windows.net/pacm/Call_for_input/MEP012-A03-CFI-Electricity-Generation-Carbon_Market_Watch-6.pdf	Select option A1.
3	4. APPLICABILITY	Paragraph 17	Carbon Market Watch strongly prefers option B1.1 regarding the applicability of hydropower plants. We explained our reasons in our last submission (Item 3). See: https://unfcccstawebprd01.blob.core.windows.net/pacm/Call_for_input/MEP012-A03-CFI-Electricity-Generation-Carbon_Market_Watch-6.pdf	Select option B1.1. Delete options B1.2 and B2.
4	6. DEMONSTRATION OF ADDITIONALITY	Paragraph 37	If eligibility is not restricted to small-scale activities in LDCs and SIDS, as we request in our previous comments, the common practice thresholds must be set at highly conservative levels to limit the risk of non-additional credits. For Article 6.4 activities located in countries that are neither LDCs nor SIDS, the common practice threshold should be 2.5%. For Article 6.4 activities located in countries that are LDCs or SIDS the common practice threshold should be either 5% or 10% maximum. We explained our reasons in our last submission (Item 3). See: https://unfcccstawebprd01.blob.core.windows.net/pacm/Call_for_input/MEP012-A03-CFI-Electricity-Generation-Carbon_Market_Watch-6.pdf	Proposed text for paragraph 37.f.ii: 5 per cent for Article 6.4 activities located in countries that are LDCs or SIDS. Alternative text proposed for paragraph 37.f.ii: 10 per cent for Article 6.4 activities located in countries that are LDCs or SIDS.